

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	GOVERNMENT'S SUPPLEMENTAL
	:	FORFEITURE
- v. -	:	<u>BILL OF PARTICULARS</u>
	:	
ISAI SCHEINBERG,	:	
RAYMOND BITAR,	:	
SCOTT TOM,	:	S3 10 Cr. 336 (LAK)
BRENT BECKLEY,	:	
NELSON BURTNICK,	:	
PAUL TATE,	:	
RYAN LANG,	:	
BRADLEY FRANZEN,	:	
IRA RUBIN,	:	
CHAD ELIE,	:	
and	:	
JOHN CAMPOS,	:	
	:	
	:	
Defendants.	:	

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Pursuant to United States v. Grammatikos, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offenses alleged in Counts Five, Six, Seven, Eight and Nine of the Indictment, as alleged in the Indictment's Forfeiture Allegations, includes all of the defendants' right, title, and interest in funds and other property held in the following bank accounts:

The G.I. Holdings Accounts

1. \$231,000.00 formerly on deposit at First Republic Bank in Account numbered 80000373283, held in the name of G.I. Holdings and all property traceable thereto;

2. \$124,178.72 formerly on deposit at Service 1<sup>st</sup> Bank of Nevada in Account numbered 2020003792 held in the name of G.I. Holdings and all property traceable thereto;
3. \$2,057,620.28 formerly on deposit at Wells Fargo Bank in Account numbered 5383346862 held in the name of G.I. Holdings and all property traceable thereto;
4. \$3,055,108.21 formerly on deposit at Citibank in account numbered 203023239 held in the name of G.I. Holdings and all property traceable thereto;
5. \$784,160.95 formerly on deposit at Citibank in account numbered 203118542 held in the name of G.I. Holdings and all property traceable thereto;
6. \$1,000.00 formerly on deposit at Citibank in account numbered 203118559 held in the name of G.I. Holdings and all property traceable thereto;
7. \$925.00 formerly on deposit at Citibank in account numbered 203118575 held in the name of G.I. Holdings and all property traceable thereto;
8. \$1,035,415.44 formerly on deposit at Nevada Commerce Bank in account numbered 0021002712 held in the name of G.I. Holdings and all property traceable thereto;
9. \$122,308.78 formerly on deposit at Nevada Commerce Bank in account numbered 0021002795 held in the name of G.I. Holdings and all property traceable thereto;
10. \$3,029,711.94 formerly on deposit at City National Bank in Account Number 3701177950, held in the name of G.I. and all property traceable thereto;

The SNR Inc. Accounts

11. \$30.27 formerly on deposit at Huntington National Bank in Account numbered 01662184444. held in the name of SNR, Inc. and all property traceable thereto;
12. \$1,057,797.29 formerly on deposit at Huntington National Bank in account numbered 01662184457 held in the name of SNR, Inc. and all property traceable thereto;
13. \$649,261.20 formerly on deposit at Huntington National Bank in Account numbered 01662191343 held in the name of SNR, Inc. and all property traceable thereto;

14. \$199,175.14 formerly on deposit at Bank of West in account numbered 658049382 held in the name of SNR, Inc. and all property traceable thereto;
15. \$4,925.00 formerly on deposit at Bank of America in account numbered 0952071585 held in the name of SNR, Inc. and all property traceable thereto;
16. \$25.00 formerly on deposit at Bank of America account numbered 0952071603, held in the name of SNR, Inc. and all property traceable thereto;
17. \$992,499.53 formerly on deposit at Citibank in Account numbered 203366638 held in the name of SNR, Inc. and all property traceable thereto;
18. \$865,000.00 formerly on deposit at Bank of America in account numbered 0952071467, held in the name of SNR, Inc. and all property traceable thereto;

The Viable Marketing Accounts

19. \$410,449.93 formerly on deposit at Bank of America Account numbered 229006067857 held in the name of Viable Marketing Corp. and all property traceable thereto;
20. \$8,168,168.89 formerly on deposit at Fifth Third Bank in Account numbered 7431859508, held in the name of Viable Marketing Corp. and all property traceable thereto;
21. \$40,960.86 formerly on deposit at Fifth Third Bank in Account numbered 7432618069, held in the name of Viable Marketing Corp. and all property traceable thereto;

The ASP Consultants, LLC Accounts

22. \$447,196.79 from account numbered 804815470 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;
23. \$12,642.44 from account numbered 804815488 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;
24. \$4,472.58 from account numbered 822823779 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;

25. \$84.21 from account numbered 822824025 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;
26. \$6,047.84 from account numbered 822824140 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;
27. \$17,460.95 from account numbered 1003245502 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;

The LST Financial Accounts

28. All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520055501, held in the name of LST Financial, and all property traceable thereto;
29. All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520057101, held in the name of LST Financial, and all property traceable thereto;
30. All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520064401, held in the name of LST Financial, and all property traceable thereto;
31. All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520065201, held in the name of LST Financial, and all property traceable thereto;
32. All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520069501, held in the name of LST Financial, and all property traceable thereto;

The EZO Account

33. \$33,743.75 formerly on deposit at Bank of America Account numbered 003678667131 held in the name of EZO, LLC and all property traceable thereto;

The Autoscribe Account

34. \$8,018.04 from Bank Account numbered 9105709543 in the name of Autoscribe Corporation at Citibank and all property traceable thereto;

The Mas Inc. Account

35. All funds formerly on deposit at Hawaii National Bank, Honolulu, Hawaii, in account numbered 12008656, held in the name of "MAS Inc.", and all property traceable thereto;

The Shared Expressions Inc. Accounts

36. All funds formerly on deposit at Sovereign Bank, in account numbered 1381076963, ABA number 231372691, held in the name of Shared Expressions Inc., and all property traceable thereto;
37. All funds formerly on deposit at WSFS Bank, in account numbered 209789056, ABA number 031100102, held in the name of Shared Expressions Inc., and all property traceable thereto;
38. All funds formerly on deposit at Bank of America, in account numbered 004631322027, ABA number 011000138, held in the name of Shared Expressions Inc., and all property traceable thereto;

as well as the following:

39. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 501 Gordon Highlands Road, Glendora, California, 91741;
40. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 550 Trayer Avenue, Glendora, California, 91741;
41. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 752 Rainbow Drive, Glendora, California, 91741;
42. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1056 E Bennett Ave, Glendora, California, 91741;
43. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1506 Forest Oaks Drive, Glendora, California, 91741; and

44. all that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 5079 Mountain Top Circle, Las Vegas, Nevada 89148;

The Government further gives notice that, as an independent and separate basis, the funds and other property in these above-described accounts are forfeitable as substitute assets, pursuant to Title 21, United States Code, Section 853(p), as specified in the Indictment.

Dated: New York, New York  
May 5, 2011

Respectfully Submitted,

PREET BHARARA  
United States Attorney

By: /s/  
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